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STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
KNOXVILLE ENVIRONMENTAL FIELD OFFICE

3711 MIDDLEBROOK PIKE
KNOXVILLE, TENNESSEE 37921-6538

October 2, 2013

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Mr. Mike Toney
Enterprise Oil
5201 Middlebrook Pike
Knoxville, TN 37921

RE: Enterprise Oil, TND 98-778-0145, Knox Co.

September 30, 2013 inspection according to the applicable statutes and rules established by or contained in Tennessee Hazardous Waste Management Act, T.C.A. 68-212-101, et seq., and the Tennessee Hazardous Waste Management Regulations, Tennessee Rule Chapter 0400-12-01.

Dear Mr. Toney:

The Division of Solid Waste Management (DSWM) appreciates the cooperation shown by your staff during the referenced inspection. The attached Hazardous Waste Inspection Report details the observations made by the DSWM personnel during the unannounced inspection.

No violations of the applicable statutes and rules governing hazardous waste management in Tennessee were cited as a result of this inspection.

Please contact me at (865) 594-5465 if there are questions or additional information is needed.

Sincerely,

Pamela Rudd
Environmental Specialist
Division of Solid Waste Management

Enclosure: 2013 Hazardous Waste Inspection Report

cc: DSWM, Nashville Central Office

HAZARDOUS WASTE INSPECTION REPORT

FACILITY/ PHYSICAL LOCATION

Name: Enterprise Oil
5201 Middlebrook Pike
Knoxville, TN 37921

EPA I.D. No.: TND 98-778-0145

County: Knox

RESPONSIBLE OFFICIAL/TITLE

Wayman Pritchard, Owner

MAILING ADDRESS

Enterprise Oil
5201 Middlebrook Pike
Knoxville, TN 37921

PRIMARY CONTACT

Charles Alexander, Manager

TELEPHONE NUMBER

865-558-0533

DATE/TIME OF INSPECTION

September 30, 2013/ 9:45 am

INSPECTION PARTICIPANTS/TITLES/AFFILIATIONS

Mike Toney, EHS Manager, Enterprise Oil
Pamela Rudd, Division of Solid Waste Management, Knoxville Field Office

REPORT PREPARED BY

Pamela Rudd
Division of Solid Waste Management
3711 Middlebrook Pike
Knoxville, Tennessee 37921
Phone: (865) 594-5465

PURPOSE OF INSPECTION

To perform a comprehensive compliance evaluation inspection with respect to the Tennessee Hazardous Waste Management Act, T.C.A. 68-212-101 et seq.; the Tennessee Hazardous Waste Reduction Act, T.C.A. 68-212-301 et seq.; the Tennessee Hazardous Waste Management Regulations, Tennessee Rule Chapter 0400-12-01, and the conditions of any applicable permit(s).

GENERATOR STATUS

Used Oil Generator, Transporter, Marketer, and Processor; Universal Waste Generator

FACILITY DESCRIPTION AND PROCESS

Enterprise Oil collects, processes, and ultimately sells oil (once processed) to refineries and asphalt plants for fuel. Approximately 90% of the oil received by Enterprise comes from automotive oil change businesses and car dealerships while the remaining percentage comes from industries and do-it-yourself persons. Halogens are checked per truckload and a composite sample is pulled from the storage tanks weekly for full analytical. Additionally, Enterprise evaluates/samples oil for new customers for contract pre-qualification (i.e. industrial or oil from an uncharacteristic source).

The oil arrives on site in tanker-trucks and delivered to one of four storage tanks for processing. First, the oil is pumped from the tanker through a filter into one of two insulated storage tanks for heat-treatment. Once the oil is heated to 180 degrees F, de-emulsifying ingredients are added to help remove water from the oil by evaporation and separation. As the water separates, the water is pumped off into a separate storage tank located behind the oil storage area and ultimately transported to one of the following: Clean Harbors, Aqua Treat, or United Solutions. Once treated, the oil is filtered again and placed in one of six 25, 000 gallon storage tanks located on the site. Next, the oil is transferred back to a tanker-truck for delivery to customers.

The site is comprised of an office building, a tank area, truck staging area, and vehicle maintenance area. The tract of the facility is comprised of approximately 7 acres and the facility employs 48 persons.

INSPECTION FINDINGS

The inspection began with an entrance interview regarding Enterprise's process. After the entrance interview, a site inspection and walk-through commenced.

General Operations

The facility is comprised of a main office building, oil storage area, and a garage maintenance area. A gated fence secures the entire site. Entrance through the gate requires an access key while entrance through the office is secured by an alarm system. Communications for the facility are landline phones located in the office areas as well as the tank farm and middle of the yard.

Tank Farm

The tank farm consists of a processing area and post processing area. In the processing area, the tank storage consists of two insulated storage tanks for oil processing and four pre-processing used oil storage tanks located inside a secondary containment area. A control room is located behind the storage area where tank contents are tracked and the boiler for the heat treatment process is located. Two storage tanks for wastewater (shipped to Aqua Treat or Clean Harbors for treatment), one storage tank for antifreeze, and one smaller storage tank for diesel are located behind the control room. The diesel is product used for the boiler. At the time of the inspection, two drums of used oil generated from cleaning filters from the treatment process. Both were correctly labeled.

The post processing area is comprised of six 25, 000 gallon storage tanks stored under cover in secondary containment. The entire storage area is located on a concrete pad where the elevation is sloped to the backside of site in order to allow rainwater to collect. The oily rainwater is pumped into the wastewater tank along with any water located within the secondary storage area. Spill control equipment is located at the off-loading area. All storage tanks were properly labeled.

Currently, enterprise is testing a piece of equipment which allows them to crush oil filters on-site, render the used oil, and then send the filters to Ameristeel for scrap metal.

Maintenance Garage

The maintenance garage consists of offices, storage area, maintenance bays, and one 500-gallon used oil storage tank. Used oil placed in the tank at the maintenance garage consists of oil from vehicle maintenance and oil from do-it-yourself person drop-offs. The storage tank was properly labeled with the words "used oil" at the time of the inspection. One parts washer is located inside the maintenance garage. According to personnel, solvent for this parts washer is merely added to it as needed. No waste is generated from the parts washer. Batteries are collected and picked up for recycling by Scotts. A few batteries were located in the equipment storage area at the time of the inspection.

Office Area

Florescent light bulbs are also collected and stored in a storage room inside the office area. As needed, the bulbs are shipped off to Veolia for recycling. A total of two boxes of 4 ft. bulbs and one box of 8 ft. bulbs were located in storage. All were correctly labeled and all had been in storage for less than one year. A certificate of recycling is sent to Enterprise when the bulbs are processed. These are kept on file at the facility.

Paperwork

The Used Oil Management Annual Report for the year 2012 was available for inspection at the site, which included vehicle inspection records. Vehicles are inspected annually and are generally performed on-site by maintenance personnel. All drivers are CDL licensed.

The SPCC plan, training, and shipment tracking logs/ receipts were also reviewed and found to be acceptable.

VIOLATIONS

No violations of the Rules Governing Hazardous Waste Management in Tennessee were cited as a result of the compliance evaluation.

Pamela Rudd 10/2/2013

Pamela Rudd
Environmental Specialist

Date

CONCURRENCE

R. Awasthi 10/2/2013

Revendra Awasthi
Field Office Manager, DSWM
Knoxville Field Office

Date

cc: DSWM, Nashville Central Office